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23 UNITED STATES DISTRICT COURT  
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF  
27 GOVERNMENT EMPLOYEES, AFL-CIO, et  
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**PLAINTIFFS' MOTION FOR  
ADMINISTRATIVE RELIEF TO EXCEED  
PAGE LIMITATION FOR  
MEMORANDUM IN SUPPORT OF  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER TO  
SHOW CAUSE**

Civil Local Rule 7-11

1 Plaintiffs American Federation of Government Employees, AFL-CIO, et al. hereby  
2 respectfully submit this Motion for Administrative Relief, pursuant to Civil Local Rule 7-11, to  
3 exceed the page limitation applicable to Plaintiffs' Memorandum in Support of Motion for Temporary  
4 Restraining Order, which is being filed today. Plaintiffs seek an additional twenty-five (25) pages for  
5 their memorandum.

6 In support of their request, Plaintiffs provide the following showing of good cause:

7 1. Plaintiffs' Motion for Temporary Restraining Order involves complex constitutional  
8 and statutory claims in a case of national importance challenging the implementation of President  
9 Donald J. Trump's "Workforce Optimization" Executive Order that is being implemented to  
10 restructure the federal government, as well as extensive evidence of government-wide irreparable  
11 harm occurring due to the actions implementing the Executive Order taken by Defendants Office of  
12 Management and Budget, Office of Personnel Management, and Department of Government  
13 Efficiency, and along with seventeen Federal Agency Defendants; the standing of twenty-four (24)  
14 union, non-profit organization, and public entity plaintiffs; and numerous other factual and equitable  
15 issues.

16 2. Plaintiffs have been diligent in drafting their motion and supporting papers, in  
17 conformity with the format and content mandated by the Court and have attempted to shorten the  
18 length of the brief as much as possible. Plaintiffs have assembled an extensive factual record to  
19 demonstrate the extent of the ongoing and imminent harm from this Order and have diligently  
20 worked to summarize that evidence for the Court. Plaintiffs have also been working as swiftly as  
21 possible to present these issues to the Court. However, Plaintiffs require an additional twenty-five  
22 (25) pages in order to fully address the complex factual and legal background for the Court,  
23 particularly given the rapidly developing factual circumstances in this case.

24 3. Plaintiffs have notified counsel for Defendants of this motion, but defense counsel did  
25 not agree to stipulate to the requested relief. *See* Chisholm Decl. ¶¶5-11.

26 On the basis of the foregoing showing of good cause, Plaintiffs respectfully request this Court  
27 to permit them to file the accompanying Memorandum in support of Motion for Temporary  
28 Restraining Order and Order to Show Cause of 50 pages.

1 DATED: May 1, 2025

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